



Privacy Impact Assessment

Entellitrak Easements

Revision: 1.0

Natural Resource Conservation Service

Date: September 28, 2009



Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	September 28, 2009	Vanitha Khera	Initial Draft

Distribution List			
Name	Title	Agency/Office	Contact Information



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1 System Information

System Information	
Agency:	Natural Resource Conservation Service
System Name:	entellitrak Easement
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	This is a web-based application that NRCS will pre-load with existing easements data, enabling the states to clean up and ensure completeness of the data.
Who owns this system? (Name, agency, contact information)	Tony Puga, 202-690-4979 ; Tony.Puga@wdc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Chuck Hart, NRCS, (970) 295-5550, Chuck.Hart@ftc.usda.gov
Who completed this document? (Name, agency, contact information)	Vanitha Khera, Program Manager, MicroPact, (703) 926 7678; vkhera@micropact.com

2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Existing easements data from interim tool
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	<p>All data originate from the Existing easements data from interim tool. New Easements will be added. This system allows NRCS staff to manage their Wetland Reserve Program (WRP), Farm and Ranch Protection Program (FRPP), Emergency Watershed Protection Program Flood Plain Easements (EWP-FPE), and Emergency Wetland Reserve Program (EWRP) application and agreement programmatic data. NRCS will be able to 1) complete and edit existing applications and agreements for WRP, EWRP, FRPP, and EWPP-FPEs, 2) add, edit, or delete new applications, and 3) evaluate and process existing applications, if eligible, into agreements. Also, for FRPP, the user will be able to add and manage additional parcels for existing agreements.</p>
4.1	What data is being collected from the customer?	Easements Application and Agreement data.
4.2	What USDA agencies are providing data for use in the system?	NRCS
4.3	What state and local agencies are providing data for use in the system?	All data originate from Easements applications and agreements.
4.4	From what other third party sources is data being collected?	No other agency data is stored, only verification
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.



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No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	N/A, Data will not be collected from individual customers
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data will be verified by using in built validation and accuracy algorithms as defined by the business owners of the system.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A, Data will not be collected from non-USDA

2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	NOTE: Data is not collected from individuals.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	NOTE: Data is not collected from individuals.



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No.	Question	Response
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Users use the procedures identified in the general business rules checker to ensure that all data is sufficient accurate, relevant, timely, and complete.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.4 Data Sharing

No.	Question	Response
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No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	<ul style="list-style-type: none">Registered Users - State program managersNRCS Operational
21	How will user access to the data be determined?	All access to ENTELLITRAK EASEMENT in a production environment must be authorized by the NRCS business sponsors.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	Appropriate security restrictions on data access is built in the system.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Users must be authenticated via eAuth and assigned to the appropriate role in order to view/browse data.
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Database level encryption



2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	ENTELLITRAK EASEMENT does not collect, store or maintain PII data. The only information that pertains to individuals is Name and Land location (not mailing address). This information is not considered to be PII per the USDA Example of Personally Identifiable Information (PII).
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	<p>If incident response assistance is needed for customers or employees, partners, volunteers, and contractors contact the USDA CIRT or NRCS Security Response Team via the following numbers:</p> <ul style="list-style-type: none">• USDA CIRT Hotline for Lost or Stolen Equipment: 888-926-2373• USDA CIRT Hotline for reporting Personal Identifiable Incidents (PII): 877-744-2968 (PII-2YOU)• NRCS/CD: (703) 200-3008 or e-mail address NRCS.Security@usda.gov <p>Additionally, each state has an Information Systems Security Point of Contact (ISSPOC) and a State Administrative Officer (SAO) that can be contacted at their Center or State Office. Furthermore, NRCS leverages incident response assistance from the USDA Cyber Security. The USDA Cyber Security provides an incident response support resource that offers advice and assistance to users of the information system for the handling and reporting of security incidents. The support resource is an integral part of the organization's incident response capability.</p>
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes -- If YES, go to question 27. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: <ul style="list-style-type: none">▪ Consolidation and linkage of files and systems▪ Derivation of data▪ Accelerated information processing and decision making▪ Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No -- If NO, go to question 28.



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No.	Question	Response
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	Customer, does not use the system.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	

3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Application and Agreement numbers
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.gpo.gov .)	N/A, ENTELLITRAK EASEMENT does not contain any PII data.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF
INFORMATION OFFICE FOR CYBER SECURITY.



Privacy Impact Assessment Authorization

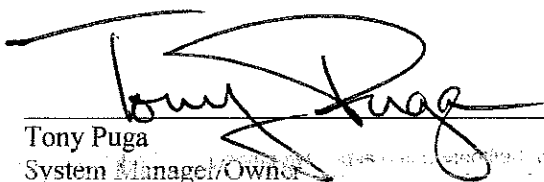
Memorandum

I have carefully assessed the Privacy Impact Assessment for the

NRCS Easements Staging Tool

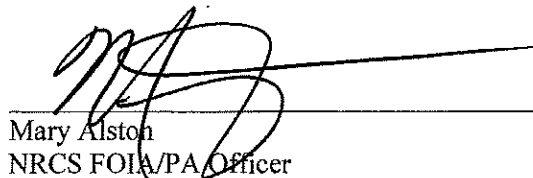
This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.



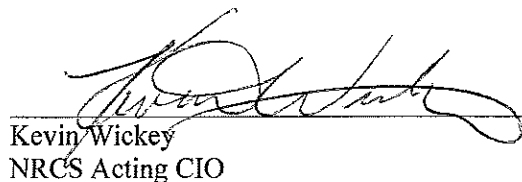
Tony Puga
System Manager/Owner

10-8-09
Date



Mary Alston
NRCS FOIA/PA Officer

10-6-09
Date



Kevin Wickey
NRCS Acting CIO

10-8-2009
Date